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**VIA ELECTRONIC FILING**

**September 20, 2024**

The Honorable Gabriel W. Gorenstein  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

**Re: Request for extension of discovery  
Tyler Erdman v. Adam Victor, et al., No. 20 Civ. 4162**

Dear Judge Gorenstein,

This letter is written to request an extension of the discovery deadline, presently set for September 18, 2024, and for an extension of the deadline for the order required in the case management plan, presently set for September 25, 2024.

Paragraph 1.E of the Court's Individual Rules and Practices states requests for extensions of deadlines must state (1) the date or dates sought to be extended, (2) the number of previous requests for extensions, (3) the reason for the extension, and (4) whether the adversary objects and, if so, the reasons given by the adversary for objecting.

This is the sixteenth request for an extension of the discovery deadline. The extension is needed so the Defendant can complete the collection and production of emails from the accounts indicated at the conference with the court dated September 6, 2024. We logged on to Mr. Victor's email sites with the provided user names and passwords and the gross number of emails (a cursory review of which revealed numerous privileged items) were in excess of 1,000.

*PLEASE RESPOND TO BROOKLYN OFFICE*

Plaintiff was consulted yesterday and today. He was asked numerous times if he consents to the extension and has refused to answer. Therefore, we decided to submit our request before more time had passed.

This letter proposes a change of the discovery deadline from September 18, 2024, to November 18, 2024. This, in turn, affects the deadline for the order required by the case management plan, presently set for September 25, 2024. We propose changing it to November 25, 2024.

Yours faithfully  
**Polizzotto & Polizzotto, LLC**

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